

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CHAMBER OF COMMERCE OF THE
UNITED STATES OF AMERICA *et al.*,

Plaintiffs,

v.

OCCUPATIONAL SAFETY AND HEALTH
ADMINISTRATION *et al.*,

Defendants.

Case No. 6:24-cv-271-ADA-DTG

CONSENT MOTION FOR EXTENSION OF TIME TO REPLY

Defendants respectfully move for an extension of time to file their reply in support of their cross-motion for summary judgment by 14 days, to October 2, 2024. Good cause supports Defendants' request to extend the September 18, 2024, deadline set forth in the parties' joint scheduling motion, ECF No. 23. The parties' briefs address Plaintiffs' multiple claims under the Administrative Procedure Act, Regulatory Flexibility Act, and U.S. Constitution, as well as Defendants' jurisdictional arguments. Moreover, undersigned counsel is currently handling several other unanticipated matters on an expedited basis. The requested extension would enable counsel to prepare a more comprehensive reply brief in this case while handling these competing obligations.

Counsel for the government conferred with counsel for Plaintiffs, who advised that Plaintiffs consent to the requested extension.

For these reasons, Defendants respectfully request that the Court extend their reply deadline to October 2, 2024.

Dated: September 4, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JULIE STRAUS HARRIS
Assistant Director

/s/ Christine L. Coogle
Christine L. Coogle
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW
Washington, D.C. 20005
202-880-0282
christine.l.coogle@usdoj.gov

Counsel for Defendants